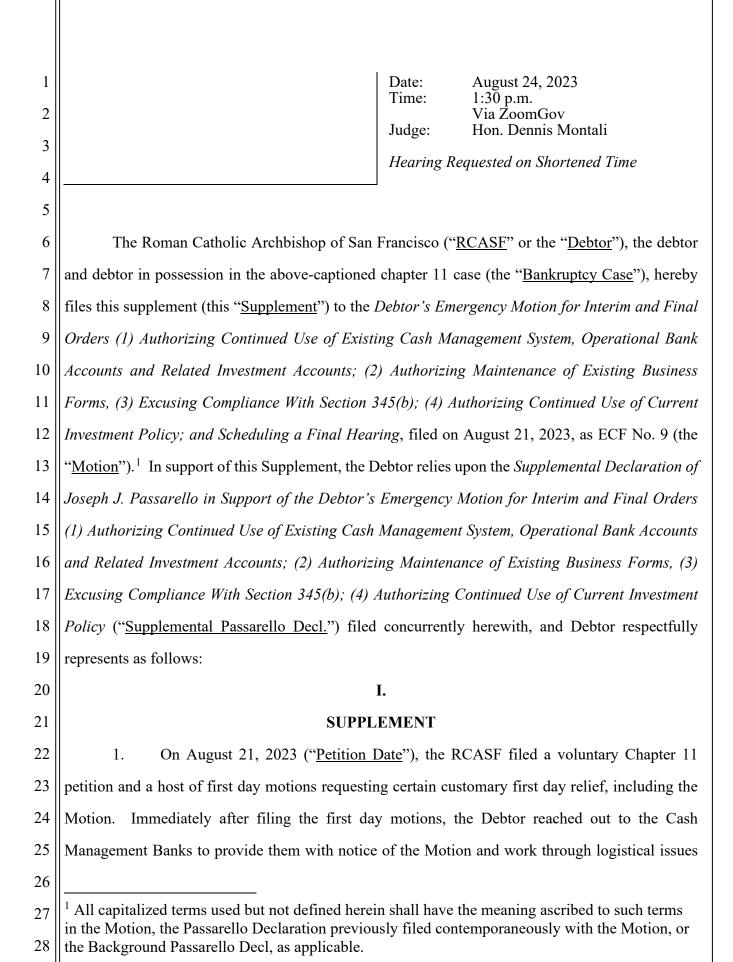
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16	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION		
17	In re	Case No. 23-30564	
18	THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO,	Chapter 11	
19	Debtor and	DEBTOR'S SUPPLEMENT TO THE DEBTOR'S EMERGENCY MOTION FOR	
20	Debtor in Possession.	INTERIM AND FINAL ORDERS (1) AUTHORIZING CONTINUED USE OF	
21		ÈXISTING CASH MANAGEMENT SYSTEM, OPERATIONAL BANK	
22		ACCOUNTS AND RELATED INVESTMENT ACCOUNTS;	
23		(2) AUTHORIZING MAINTENANCE OF EXISTING BUSINESS FORMS,	
24		(3) EXCUSING COMPLIANCE WITH SECTION 345(b); (4) AUTHORIZING	
25		CONTINUED ÙŚE ÓF CURRENT INVESTMENT POLICY; AND	
26		(5) SCHEDULING A FINAL HEARING	
27		Filed concurrently with Supplemental Declaration of Joseph J. Passarello	
28			

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with attempting to convert the Bank Accounts to debtor in possession accounts. During one of those calls, BofA made the Debtor and its advisors aware of eight additional accounts (held at BofA) all of which have been open since before 2008—predating Mr. Passarello as CFO— and which are being used by four High Schools likely as their main operating accounts, development accounts, and/or payroll accounts (the "Additional Bank Accounts"). Although no funds in the Additional Bank Accounts have originated from the Debtor or its operations, and the Debtor has been largely unaware that the Additional Bank Accounts are listed under the Debtor's employer identification number ("EIN number"). Additionally, certain representatives of the Debtor are listed as co-signors on the Additional Bank Accounts.

- 2. The Additional Bank Accounts have not been listed in the Debtor's general ledger, do not contain funds of the Debtor, and the Debtor does not use or control the operation of the Additional Bank Accounts; however, because they are listed under the Debtor's name at BofA, the Debtor hereby requests that the Court authorize the continued use of the Additional Bank Accounts in the ordinary course of business without the need to designate such accounts as debtor in possession accounts or otherwise complying with the requirements of Bankruptcy Code section 345(b).
- 3. Without this relief, these High Schools, which have just welcomed students back from summer break, will suffer irreparable harm if unable to access their funds or suffer a delay in use of those funds, as they need to cover day-to-day operating costs and make payroll for the teachers and staff in the upcoming days.
- 4. Additional information about the High Schools and the Additional Bank Accounts is included in the Supplemental Passarello Declaration filed concurrently herewith.

II.

## RELIEF REQUESTED

5. By this Supplement, the Debtor requests that the Court authorize the continued use of the Additional Bank Accounts as used in the ordinary course of business, without the need to designate such accounts to debtor in possession accounts as outlined in the U.S. Trustee's

1	Guidelines. To implement this relief, the Debtor requests that the following language be added to		
2	the Debtor's proposed Order attached to the Motion:		
3	The Debtor is excused from redesignating the Additional Bank Accounts as		
4	debtor in possession accounts and complying with the requirements of section		
5	345(b) as to the Additional Bank Accounts.		
6	6		
7	Dated: August 22, 2023		
8		FELDERSTEIN FITZGERALD WILLOUGHBY	
9	PASCUZZI & RIOS LLP		
10	10 By	/s/ Paul J. Pascuzzi	
11	PAUL J. P.	ASCUZZI	
12	JASON E. THOMAS	RIOS R. PHINNEY	
13	Floposed F	attorneys for The Roman Catholic	
14	Dated: August 22, 2023	o of San Francisco	
15	SHEPPARD, MULLIN, RICHTER & HAMPTON LLP		
16			
17	By	/s/ Ori Katz	
18	ALAN H.		
19	Dranged /	Attorneys for The Roman Catholic	
20	Archbisho	p of San Francisco	
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